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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ADRIAN ANGON OCHOA and)	Case No.: 2:12-CV-1210-LRH-VCF
ILIANA DENISSE MORAN TORRES,)	
)	
Plaintiffs,)	
)	
v.)	
)	
HILLARY CLINTON, et al.,)	
)	
Defendants.)	

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME

(Third Request)

Defendants, by and through their attorneys, request a third extension of time to file an answer or other appropriate responsive pleading to Plaintiffs' complaint.

The parties have worked diligently to resolve the cause of action without expending further resources of the court or the parties. The case challenges the denial of Plaintiff Adrian Angon Ochoa's ("Ms. Angon") visa application by the U.S. Consulate in Ciudad Juarez, Mexico. Since the

1 complaint was filed, Defendants have advised Plaintiffs of the requisite
2 documents that must be filed and approved before Defendants will reconsider
3 Ms. Angon's visa application in an effort to resolve this litigation.

4 Since the Court granted the second motion to extend time to answer, the
5 parties learned that Ms. Angon accrued unlawful presence in the United
6 States, so she must have an approved Form I-601, Application for Waiver of
7 Grounds of Inadmissibility, before the U.S. Consulate may reconsider her visa
8 application. Plaintiffs advised Defendants' counsel that Ms. Angon submitted
9 the Form I-601, and Defendants are attempting to expedite processing by U.S.
10 Citizenship and Immigration Services. Defendants also have advised
11 Plaintiffs of the updated documents (medical examination and passport) that
12 must be submitted to the U.S. consulate in order for her visa application to
13 be considered. When Ms. Angon's file is complete, then the U.S. Consulate is
14 expected to re-adjudicate the visa application within thirty (30) days, and
15 the litigation will be moot.

16 Defendants' counsel consulted with Plaintiffs' counsel, attorney Troy
17 Baker on behalf of attorney Anthony Guenther, and Plaintiffs do not oppose
18 this motion.

19 The current deadline to answer the complaint is December 18, 2012,
20 based on the court's order granting the second unopposed motion to extend the
21 deadline. (ECF No. 8, Nov. 18, 2012). To allow the parties additional time
22 to work towards resolution of the litigation, Defendants respectfully request
23 that the court grant an additional ninety (90) day extension of time to file
24 an appropriate pleading to answer the complaint up to and including Monday,
25 March 18, 2013.

1 DATED: December 18, 2012

Respectfully submitted,

2 Daniel G. Bogden
United States Attorney

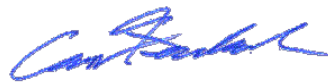
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5 /s/ Troy D. Liggett
Troy D. Liggett
6 Trial Attorney
District Court Section
7 Office of Immigration Litigation
Civil Division
8 U.S. Department of Justice

9
10 IT IS SO ORDERED:

11 

12 UNITED STATES MAGISTRATE JUDGE

13
14 DATE: 12-19-2012